

NOT YET SCHEDULED FOR ORAL ARGUMENT

No. 24-7127

IN THE UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

GREGORY T. ANGELO, *et al.*,
APPELLANTS,

v.

DISTRICT OF COLUMBIA, *et al.*,
APPELLEES.

ON APPEAL FROM A JUDGMENT OF THE
UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

**JOINT CONSENT MOTION OF APPELLEES FOR 4-DAY EXTENSION
OF TIME TO FILE THEIR RESPONSE BRIEF**

The response brief of appellees the District of Columbia, Pamela A. Smith, Brian L. Schwalb, and Michael Anzallo is currently due on May 19, 2025. Appellees respectfully request a 4-day extension of time, until May 23, within which to file that brief. Appellants consent to this relief.

There is good cause for the requested relief. The Office of the Solicitor General continues to have a heavy workload, and the undersigned is engaged in the press of other matters, including a brief in opposition to certiorari in *American Airlines Group Inc. v. United States*, No. 24-938 (U.S.) (due May 27); and an

intervenor-appellee response brief in *Carruth v. United States*, No. 23-CF-387 (D.C.) (currently due June 2). Additional time is thus necessary for the completion of the appellees' response brief in this case.

Accordingly, this Court should grant the appellees' request for a 4-day extension of time, until May 23, 2025, to submit their response brief.

Respectfully submitted,

BRIAN L. SCHWALB
Attorney General for the District of Columbia

CAROLINE S. VAN ZILE
Solicitor General

ASHWIN P. PHATAK
Principal Deputy Solicitor General

THAIS-LYN TRAYER
Deputy Solicitor General

/s/ Janice L. Cole
JANICE L. COLE
Senior Counsel II
D.C. Bar Number 54489
Legal & Compliance, WMATA
PO Box 23768
Washington, DC 20026-3768
(202) 962-2543
jlcole@wmata.com
Counsel for Appellee
Michael Anzallo

/s/ Bryan J. Leitch
BRYAN J. LEITCH
Assistant Attorney General
D.C. Bar Number 1016484
Office of the Solicitor General

Office of the Attorney General
400 6th Street, NW, Suite 8100
Washington, D.C. 20001
(202) 724-6524 (office)
(202) 741-0649 (fax)
bryan.leitch@dc.gov

*Counsel for Appellees District of Columbia,
Pamela A. Smith, and Brian L. Schwalb*

May 2025

CERTIFICATE OF COMPLIANCE

I certify that this motion complies with the type-volume limitation in Federal Rule of Appellate Procedure 27(d)(2)(A) because the motion contains 157 words, excluding exempted parts. This motion complies with the typeface and type style requirements of Federal Rules of Appellate Procedure 27(d)(1)(E) and 32(a)(5) and (6) because it has been prepared in a proportionally spaced typeface using Microsoft Word 365 in Times New Roman 14-point font.

/s/ Bryan J. Leitch
BRYAN J. LEITCH